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Attorneys for Defendant FACEBOOK, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

ANGEL FRALEY; PAUL WANG; SUSAN  
MAINZER; JAMES H. DUVAL, a minor, by  
and through JAMES DUVAL, as Guardian ad  
Litem; and W.T., a minor, by and through  
RUSSELL TAIT, as Guardian ad Litem;  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

FACEBOOK, INC., a corporation; and DOES  
1-100,

Defendants.

Case No. CV 11-01726 LHK (PSG)

**SUPPLEMENTAL DECLARATION OF  
SANDEEP N. SOLANKI IN SUPPORT OF  
DEFENDANT FACEBOOK, INC.'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PURSUANT TO CIV. L.R.  
79-5**

**[Civ. L.R. 79-5]**

Courtroom: 4  
Judge: Hon. Lucy H. Koh  
Trial Date: Dec. 3, 2012

1 I, Sandeep N. Solanki, declare:

2 1. I am a Litigation Counsel employed by Defendant Facebook, Inc. ("Facebook"). I  
 3 submit this supplemental declaration in support of Facebook's Administrative Motion to File  
 4 Under Seal Pursuant to Civ. L.R. 79-5 ("Facebook's Administrative Motion"), filed with the  
 5 Court on April 19, 2012. I am informed that a small number of descriptions of the bases for  
 6 redactions in Facebook's Opposition to Plaintiffs' Motion for Class Certification (the  
 7 "Opposition"), as well as Exhibit Y to the Declaration of Matthew D. Brown, were inadvertently  
 8 omitted from my April 19, 2012 declaration filed in support of Facebook's Administrative  
 9 Motion. I submit this supplemental declaration to support the filing of those items under seal.  
 10 Except as otherwise noted, I have personal knowledge of the facts set forth below, and if called as  
 11 a witness to testify, could and would testify competently thereto.

12 **Facebook's Opposition Brief**

13 2. Facebook's Opposition references, analyzes or relies upon confidential and  
 14 proprietary Facebook business information that is non-public, as set forth in the below chart.  
 15 Public disclosure of this information would cause competitive harm to Facebook by giving third-  
 16 parties access to sensitive information, which they could use to gain an unfair advantage against  
 17 Facebook. In addition, Facebook's Opposition contains non-public information of individual  
 18 third-party Facebook users, which has been redacted to protect their privacy. A copy of  
 19 Facebook's Opposition with proposed redactions narrowly tailored to redact only this information  
 20 (along with information *Plaintiffs* designated Confidential under the Protective Order) was lodged  
 21 with the Court under seal on April 20, 2012. Below is a chart showing the basis for proposed  
 22 redactions in Facebook's Opposition that were inadvertently omitted from the chart in Paragraph  
 23 5 of my April 19, 2012 declaration.

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**ADDITIONAL CITATIONS TO REDACTIONS OF FACEBOOK INFORMATION**

| DESCRIPTION                 | CITATION           | BASIS TO REDACT  |
|-----------------------------|--------------------|--|
| Facebook's Opposition Brief | p. 7, line 3       | Confidential information regarding product performance and related metric  |
| Facebook's Opposition Brief | p. 12, line 11     | Confidential information regarding product performance and related metric.   |
| Facebook's Opposition Brief | p. 14, lines 10-15 | References to third-party Facebook user information that Facebook has redacted to protect the individual's privacy.  |
| Facebook's Opposition Brief | p. 18, line 11     | Calculation of numbers based in part upon confidential information regarding product performance and related metric. |
| Facebook's Opposition Brief | p. 19, line 21     | Calculation of numbers based in part upon confidential information regarding product performance and related metric. |

**Exhibit Y to the Brown Declaration**

3. Exhibit Y to the Declaration of Matthew D. Brown contains information about the Facebook usage of one of the named Plaintiffs and third-party Facebook user information that Facebook is filing under seal to protect their privacy.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 2, 2012 in Menlo Park, California.

/s/ Sandeep N. Solanki

Sandeep N. Solanki

**GENERAL ORDER 45 ATTESTATION**

In accordance with General Order 45, concurrence in the filing of this document has been obtained from the signatory and I shall maintain records to support this concurrence for subsequent production for the Court if so ordered or for inspection upon request by a party.

Dated: May 2, 2012

COOLEY LLP

/s/ Michael G. Rhodes

Michael G. Rhodes  
Attorneys for Plaintiff

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